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Subject: combined response to questions
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Attachments: [MAP.pdf](#)

Is this facility a High Risk Facility under RMP?

- In order to be a high-risk facility, a facility must have a Worst Case Scenario population of at least 100K, a hazard index of at least 25, or any accident in its RMP 5-year accident history. The Williams Olefins facility in Geismar, Louisiana, a Title V permitted facility, is a High Risk Facility based on the amount of regulated substances they have on site in quantities over a threshold amount.

What are the closest community (demographics), school and hospital?

- Map Attached (in separate file)
- No hospitals or nursing homes within 5 miles or within the extent of the map
- The 2 closest schools to the northwest, right outside of the 2 mile buffer line, are both correctional centers but are included in the HSIP Schools database, so measured to the 3rd closest school as well, which is actually a school.
- Closest School (2.27 Miles); 3rd Closest School (3.64 Miles)
- Daycare (3.91 Miles)
- Hospital (7.32 Miles)
- Nursing Home (7.24 Miles)

What was the cause of the explosion ?

- Unknown at this time and under Investigation

What is the enforcement history?

- Summary of Enforcement Actions in the last 5 years.

(The following summary of the Louisiana Dept of Environmental Quality's (LDEQ's) actions regarding Williams Olefins were obtained through reviewing information from LDEQ's Electronic Document Management System.)

LDEQ Enforcement:

3/26/09 - Settlement Agreement (Penalty \$4,500) between LDEQ and Williams Olefins to resolve the following violations:

- 2/18/07 release of 2600 lbs of propylene (Reportable Quantity or State R.Q. is 100 lbs)
- 4/6/07 release of 47,810 lbs of ethylene (State R.Q. is 100 lbs); 514 lbs propylene; and 12 lbs of 1,3- butadiene (R.Q. is 10 lbs).
- 2/1/07 release of 58 lbs of benzene (R.Q. is 10 lbs)
- 4/4/07 release of 36 lbs of benzene
- 7/16/07 release of 86 lbs of benzene
- Inappropriate sampling technique at the Steam Stripper observed during 11/28/07 inspection

11/15/10 - LDEQ issued a Compliance Order and Notice of Potential Penalty (CONOPP) to Williams Olefins regarding the following violations:

- 4/21/09 preventable release of 93 lbs of benzene.



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- 9/18/08 release of 4,360 lbs of propylene
- 9/22/09 reported that new LDAR components had not been identified and monitored as required
- Settlement negotiations are on-going between the parties.

Why was the facility inspected in 2011?

- The December 2011 inspection conducted by LDEQ at the facility appears to be a regularly scheduled inspection. The last 3 inspections conducted by LDEQ were 2 years apart and appear to be regularly scheduled Full Compliance Evaluations (FCEs) based upon LDEQ's Compliance Monitoring Strategy that requires inspections every other year at facilities that have Title V permits.

What does air monitoring data show?

- As of late evening on Thursday June 13, 2013, LDEQ is reporting that preliminary speciated analysis indicates that the levels are low and do not represent a concern.
- Initial reports received mid day on June 13, 2013, stated that air monitoring data indicated that levels were Non Detect outside the facility. There are slight VOCs at the fractionating column where the material is burning off (flare) but within the facility and no offsite impacts.

What was the basis for the Offsite Consequence Analysis included in the Williams Olefins RMP:

Worst Case Scenario Information

Chemical Type	Chemical	Population	Distance to Endpoint	Quantity
Flammable	1,3-Butadiene	0	0.90	1,500,000
Toxic	Chlorine	6	1.30	2,000

What is the Status of EPA's Leak Detection and Repair (LDAR) case status?

Status of EPA Leak Detection and Repair (LDAR) Case:

- May 2007 - EPA Region 6 conducted a Clean Air Act inspection.
- April 2009 - Case referred to the Department of Justice (DOJ) for 3 counts of CAA violations (LDAR).
- September 2009 - EPA received notice that DOJ declined to pursue the case.
- Early 2010 through June 2012 - EPA Region 6 asked for the case to be returned to allow for us to assess our administrative enforcement options. Case never returned.
- June 2012 - EPA Region 6 decided to close the case due to the pending statute of limitations on the 2007 LDAR claims and work with LDEQ to determine the need to reinspect for LDAR compliance.

How long will they flare?

- The material is coming from process piping within the plant and also possibly residual material in the fractionating column. At this time they plan to flare the material until it all burns off.

What are the locations of fixed and mobile air monitoring stations?

- LDEQ does have 2 stationary monitoring stations: 1) Carville (upwind of facility) and 2) Dutchtown (not directly downwind but somewhat
- The facility said they usually have an infrared system in place to monitor VOCs but the fire took it out.

What are R6 next steps (plan for next day)?

- EPA Region 6 deployed an On Scene Coordinator (John Martin) to the scene mid morning June 13 to coordinate with LDEQ and the State Police and to serve as the Federal On Scene Coordinator. Though it appears that the emergency response portion of this incident may be over, EPA will continue to coordinate with the State on air and water runoff monitoring activities to determine any additional response actions which need to be taken by the facility, State or EPA.
- Air monitoring sample analysis received from LDEQ preliminary indicates that the levels are low and do not represent a concern.
- Within the next 2-4 weeks, after the response is completed and the facility is in the recovery stage, a team of RMP inspectors will conduct an root cause/after action inspection of the facility. The inspection team will be comprised with staff from both Superfund and Enforcement Divisions

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